

RIGHT-OF-WAY PROPERTY MANAGEMENT AND AIRSPACE STORM WATER GUIDANCE MANUAL

October 6, 2006

California Department of Transportation
1120 N Street
Sacramento, CA 95814

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1.0 INTRODUCTION

1.1 BACKGROUND

The Division of Right-of-Way (RW) acquires, maintains, and leases suitable residential, non-residential and airspace properties to public and private third parties. Airspace property is any property within operating State highway right-of-way limits that is capable of other development and can safely accommodate a secondary use without interference with the operation and foreseeable future expansion of the highway without endangering the traveling public. Examples of such secondary uses include parking lots, self-storage units, commercial businesses, light industry and cellular telephone towers. Existing leases are contracts that include language requiring that the lessee comply with all applicable local, state, and federal rules, laws and regulations. RW inspects these properties to determine compliance with the Caltrans Statewide Storm Water Management Plan (SWMP) and permits such as the California Industrial Activities Storm Water General Permit (General Industrial Permit).

1.2 PURPOSE

The purpose of the Right of Way Property Management and Airspace Storm Water Guidance Manual (Manual) is to provide guidance for RW agents and lessees to comply with requirements of SWMP and the General Industrial Permit. Within this Manual is an explanation of the purpose of storm water Best Management Practices (BMPs), and lessee compliance obligations to implement the BMPs. Additionally, procedures and inspection forms are provided so that RW agents may evaluate compliance of existing lessees and to provide direction to potential lessees.

Procedures are provided to illustrate compliance requirements of the SWMP and the Caltrans Statewide Stormwater Permit (Caltrans Statewide Permit) applicable to lessees. The Caltrans Statewide Permit is provided in Appendix A. The procedures also provide tools to assist with evaluating non-residential activities and determining the need for compliance with the General Industrial Permit. This Manual should be used in conjunction with the General Industrial Permit, which is provided as Appendix B. In case of conflict, the requirements of the General Industrial Permit will prevail over this Manual for those facilities that require coverage under the Permit. Sections of the General Industrial Permit are hereby incorporated by reference except as specifically modified in this Manual. The following procedures apply to all RW activities undertaken by the Department. This Manual does not, nor is it intended to add to or modify any legal requirements contained in the Caltrans Statewide Permit or the General Industrial Permit.

2.0 REGULATORY BACKGROUND

2.1 STATEWIDE GENERAL INDUSTRIAL PERMIT

In California, the State Water Resources Control Board (SWRCB), through the nine Regional Water Quality Control Boards (RWQCB), administers the National Pollutant Discharge Elimination System (NPDES) storm water permit program (Appendix C). The SWRCB issued the General Industrial Permit, which applies to all storm water discharges from categories of industrial facilities in the state requiring coverage under the federal stormwater regulations.

The SWRCB issued the Statewide Caltrans Permit that regulates all Caltrans properties and construction, industrial/commercial and residential activities and/or land uses. The current Statewide Caltrans Permit was adopted in 1999. This Manual is just one portion of a larger Caltrans program to comply with the requirements of the Statewide Caltrans Permit.

The General Industrial Permit regulates discharges associated with 10 broad categories of industrial activities. A discharge is defined as a release of flow of storm water or other substance from a conveyance system or storage container and on a broader scale, includes release to municipal separate storm sewer systems (MS4s), etc¹. The General Industrial Permit requires the implementation of management measures that will achieve the performance standard of best available treatment (BAT) economically achievable and best conventional pollutant control technology (BCT). The General Industrial Permit also requires the development of a Storm Water Pollution Prevention Plan (SWPPP) and a monitoring and reporting program (MRP).

2.2 STORM WATER MANAGEMENT PLAN

The SWMP describes a program to reduce the discharge of pollutants associated with the MS4s that serve highways and highway-related properties, facilities and activities. It identifies how the Department will comply with the provisions of the Caltrans Statewide Permit. The SWMP addresses the primary program elements of all the Department's activities, including:

- ◆ The Project Delivery Storm Water Management Program, which includes the Design Storm Water Management Program and the Construction Storm Water Management Program;
- ◆ The Maintenance Storm Water Management Program; and
- ◆ The Training and Public Education Program.

The SWMP also addresses assignment of responsibilities for implementing storm water management practices as well as monitoring, program evaluation and reporting activities.

According to the SWMP (May 2003), RW is required to review existing airspace leases (as they are renewed) for inclusion of appropriate storm water language, and document the results in the Department's

¹ California Stormwater BMP Handbook Industrial and Commercial. <www.casqa.org>

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Storm Water Program Annual Report. The Department provides a summary of its progress on the review and revision of existing air space leases in the Annual Report to the SWRCB. However, the SWMP is in the process of being updated. Upon approval of the updated SWMP, RW will be required to maintain a list of all properties subject to the requirements of the General Industrial Permit, and provide this list in the Annual Report.

3.0 BEST MANAGEMENT PRACTICE SELECTION AND IMPLEMENTATION

3.1 BACKGROUND

BMPs are operational activities or physical controls that are applied to storm water and other runoff to reduce the discharge of pollutants. These include both structural and nonstructural controls that have direct effects on release, transport or discharge of pollutants. BMPs can be applied to activities conducted on leased properties, thereby promoting compliance with storm water regulations. BMPs include a broad class of measures, many of which may already be used for reasons unrelated to storm water pollution. BMPs are commonly defined two ways: whether they are Non-Structural or Structural (as in the General Industrial Permit), and whether they are Source Control or Treatment Control (as described in this Manual).

The purpose of this section is to provide assistance and resources to RW and lessees in evaluating residential, non-residential and airspace activities with regard to BMP selection and implementation. Following the evaluation, this Manual can be used for the selection of appropriate and specific BMPs for the observed site activities. The selected BMPs are implemented in order to fulfill obligations required by the SWMP and the Caltrans Statewide Permit.

3.2 BMP FACT SHEETS

BMP fact sheets have been developed and are included in this Manual for residential and non-residential leased property. The BMP fact sheets consist of a double-sided single page, individually numbered and suitable for photocopying. These fact sheets detail storm water pollution prevention methods and concepts that should be taken into consideration when performing described activities. The fact sheets are arranged by land use categories (e.g. agricultural) followed by activities associated the land use type (e.g. irrigation, pesticide use, etc.). The fact sheets should be incorporated into executed lease contracts by RW to promote compliance with leased property storm water management objectives. Residential BMP fact sheets are included in Appendix D of this Manual and non-residential fact sheets are provided in Appendix E.

3.3 BMP SELECTION

Effective storm water management begins with selection of the most appropriate, activity-specific BMPs. BMPs are selected by lessees (or tenants) following the identification of potential storm water pollution sources for a facility or activity. BMPs should be selected to prevent or reduce contact of storm water and non-storm water discharges with pollutants. Emphasis should be placed on implementation of Source Control BMPs. Treatment Control BMPs should be implemented only if clearly needed because controlling pollutants at the source is more efficient and cost effective than removing them from storm water runoff.

3.3.1 Identify Potential Pollution Sources

Before selecting the appropriate BMP for a given activity or facility, the potential storm water pollution source(s) must be identified. The recommended approach is to identify all activities and associated potential pollutant sources to determine which areas of the property are likely sources of pollutants in storm water and non-storm water discharges, and which pollutants are likely to be present in storm water and non-storm water discharges. Knowledge of the facility type and operations conducted provides insight into the pollutants likely to be present. The manner in which the materials are stored and handled also has an impact on the potential for storm water pollution.

3.3.2 Identify Existing BMPs

Many facilities/activities may already have BMPs in place. These BMPs may include pavement sweeping, cleaning of restaurant grease traps, covered waste storage bins, and spill prevention and cleanup procedures. Other examples of BMPs include berming, covered material storage areas, and designated wash areas. During inspections, the RW Agent should observe the facility to determine if these existing BMPs are implemented and effective to address the site activities and potential pollution sources. These BMPs may have been implemented for other reasons such as good housekeeping or financial savings, or to comply with the requirements of other regulatory programs. Based on the site activities and potential pollution sources, the existing BMPs may need to be modified or supplemented to address storm water issues and requirements of the General Industrial Permit and the Caltrans Statewide Permit.

3.3.3 Assess Potential Pollution Sources

To assess the significance of the identified potential pollution sources, consider items such as existing storm water BMPs; quantities of source materials handled, produced, stored, or disposed of; the likelihood of exposure to storm water or authorized non-storm water discharges; history of spills or leaks; and run-on from outside sources. To begin this assessment, prepare a list of authorized non-storm water discharges and facility activities that have a reasonable potential to contribute pollutants of concern to storm water. These pollutants of concern include petroleum products, sediment, trash and debris, metals, caustic and acidic substances, fertilizers (nutrients), solvents, paints, herbicides, and other materials. The potential and relative significance of each activity to cause storm water pollution should then be considered. This assessment is typically subjective based on the relative percentage of area covered by each activity, the nature of the activity, and the types of materials associated with each activity.

3.3.4 Complete an Assessment Summary

The list of activities and their potential to cause storm water pollution should be compiled into an assessment summary. This summary will serve as the basis for the BMP Identification Phase. The assessment should contain sufficient information to determine which areas and activities may be potential contributors to storm water pollution, and which BMPs are most suitable. Prioritization of BMP implementation may also become apparent at this time. Note that RW will only determine if the BMPs meet the implementation requirements of the SWMP.

3.3.5 Prepare BMP List and Prioritize

The final step of the assessment is to finalize the list of BMPs and identify the BMPs for each activity performed on the property. These BMPs should be prioritized for implementation by the lessee. Implementation of the applicable BMPs specified in the activity fact sheets indicates compliance with the Caltrans Statewide Permit

In finalizing the assessment, BMPs for exempt non-stormwater discharges and specific actions to terminate unauthorized non-storm water discharges should be identified. Low and nominal-cost BMPs that address the activities identified in the assessment summary should be identified and prioritized. If activities remain that are significant sources of pollution, a strategy that may include implementation of more detailed BMPs should be developed to address those sources.

3.6 BMP IMPLEMENTATION

In most cases, BMP implementation is the responsibility of the lessee (or tenant). The Department will be responsible for general building maintenance and landscape upkeep for residential property, whereas the lessee will be responsible for BMP implementation and maintenance for non-residential property leases. Tenants of single-family residences also have responsibility for general yard maintenance.

3.6.1 Residential Property

BMP implementation for residential tenants will consist of actions such as:

- Using
 - proper storage and use of pesticides and fertilizer;
 - dry methods to cleanup spills outside the residence whenever possible;
 - proper methods for storage and disposal of hazardous household waste
- Maintaining landscape irrigation systems and methods so as to avoid excess irrigation runoff;
- Disposing of household waste in covered receptacles; and
- Picking-up pet waste on a regular basis.

For example, minor automobile maintenance, if any, should be performed in dry weather, over impervious surfaces and under a covered area to prevent exposure of wastes to storm water and so that spills can be readily cleaned up. Used vehicle fluids must be segregated and recycled by taking them to approved recycling collection centers.

The Department, through its maintenance contractors, will be responsible for building maintenance, pool maintenance, painting, landscape and other property maintenance. Tenants of single-family residences may also be responsible for pool or yard maintenance. BMP fact sheets are available for these and other activities and should be implemented during these work tasks.

3.6.2 Non-Residential Property

The lessee of a non-residential property will be responsible for selection, implementation and maintenance of BMPs. However, RW may also require certain minimum BMPs as a condition of the lease. Low or modest cost BMPs, many of which may already be in place, will usually provide

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satisfactory protection to meet the intent of the SWMP. Additional guidance is provided in that the General Industrial Permit requires that consideration be given first to Non-Structural Source Control BMPs. The following general categories of Non-Structural Source Control BMPs should be considered in evaluating non-residential lease properties:

- Good housekeeping
- Preventive maintenance
- Spill prevention and response
- Material handling and storage
- Waste handling and recycling
- Employee training, if provided
- Site Inspections
- Record keeping and internal reporting

The lessee should prepare and implement a schedule for BMP implementation, maintenance, inspection, and ongoing evaluation. It is important that the lessee maintain the BMPs, particularly any Treatment Control BMPs. However, other BMPs also require regular attention such as spill containment materials, drip pans, etc.

3.7 BMP IMPLEMENTATION EFFECTIVENESS

RW routinely inspects leased properties to verify that tenants are maintaining the premises in a neat and orderly manner, with proper storage of materials, and to ensure that there are no illicit discharges. As part of the facility inspection, the BMP's implementation effectiveness is evaluated. The non-residential facilities will most likely have already implemented BMPs. These may include pavement sweeping; proper disposal of wash water, sweepings and sediments control; covered waste storage bins; and spill prevention and cleanup procedures.

It is the responsibility of the RW agent to determine what BMPs are present and if their implementation is either satisfactory or needs improvement. The following items should be considered when conducting the BMP evaluation:

- ◆ during daylight hours on days with no stormwater discharges:
 - Check the drainage areas within the facility for indications of unauthorized non-stormwater discharges,.
 - Observe authorized non-stormwater discharges and their sources
- ◆ . Review:
 - site activities to ascertain if changes have occurred, and if so, whether new or modified BMPs are needed

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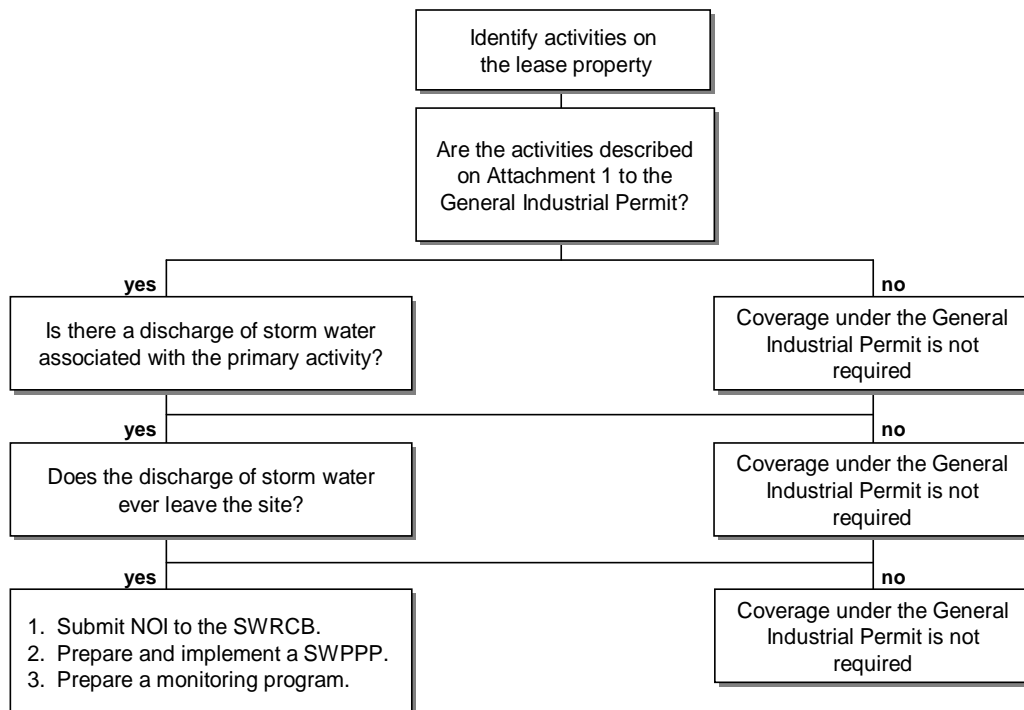
- . the list of materials used or stored to ascertain if the list has changed, and if so, whether new or modified BMPs are needed
- . spills that have occurred over the past 12 months, with a determination of cause(s) and possible solutions, including modified or new BMPs
- ◆ . Make a determination of whether each BMP must be modified, replaced, and whether additional BMPs are needed

4.0 FACILITY ASSESSMENT

4.1 INTRODUCTION

This section provides guidance to RW agents in evaluating non-residential activities of lessees to determine their need for coverage under the General Industrial Permit. The RW agents will evaluate the facility's activities to determine if they are included under the ten categories of industrial activity described in the General Industrial Permit and to determine if there is a discharge of storm water or authorized non-storm water discharge associated with facility activities. Evaluation of non-residential activities typically requires an on-site facility assessment (Storm Water Inspection) and a review of facility information available in RW files. Figure 4-1 below shows a decision tree to determine if a facility's activities are included under the ten categories of the General Industrial Permit and to then determine if there is a discharge of storm water or authorized non-storm water discharge associated with the facility activities.

Figure 4-1. Decision Tree to Assist the RW Agent Assess Lessee General Industrial Permit Coverage



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The decision whether a facility is required to obtain coverage under the General Industrial Permit is determined by what activities occur onsite. It is the industrial activities at the facility (and subsequent Standard Industrial Classification [SIC] code) that determine whether coverage under the Permit is required, not the primary business of the lessee. For example, a lessee must obtain coverage under the General Industrial Permit for its vehicle maintenance facility, even though the primary business may be transportation or catering services. Information regarding identification of SIC codes is presented in Section 4.5.

As indicated in the General Industrial Permit, Sections 4.2 and 4.3 provide a discussion on facilities that do and do not require coverage under the General Industrial Permit.

4.2 FACILITIES THAT REQUIRE GENERAL INDUSTRIAL PERMIT COVERAGE

The General Industrial Permit is intended to cover the following general categories of federal, state, municipally owned, and private facilities that discharge storm water:

1. Facilities subject to storm water effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards
2. Manufacturing facilities
3. Oil and Gas/Mining facilities
4. Hazardous waste treatment, storage, or disposal facilities
5. Landfills, land application sites, and open dumps
6. Recycling facilities
7. Steam electric power generating facilities
8. Transportation facilities
9. Sewage or wastewater treatment works
10. Manufacturing facilities where industrial materials, equipment, or activities are exposed to storm water

Category ten refers to facilities where materials handling equipment or activities, raw materials, immediate products, final products, waste materials, by-products, or industrial machinery are exposed to storm water. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, finished product, by-product, or waste product.

The General Industrial Permit is intended to address all facilities described in Exhibit 1 presented in Appendix G, whether the facility is primary or is auxiliary to the facility operator's function. For example, although a marina's primary function is recreation, a facility that it operates for boat maintenance is a transportation facility that is covered by the General Industrial Permit.

4.3 FACILITIES THAT DO NOT REQUIRE COVERAGE

There are a number of business categories and associated activities that do not require coverage under the General Industrial Permit. Information regarding evaluation of these facilities is provided in Section 6. Nevertheless, these business categories and activities may have the ability to impact storm water quality. The lessee should implement Source Control BMPs where appropriate to reduce such impacts. Source Control BMP fact sheets are provided in the RW BMP Guidance Manual. These BMP fact sheets will assist the lessee in identifying appropriate Source Control BMPs. As indicated in the General Industrial Permit, the categories of businesses that are not required to obtain coverage under the Permit include:

- ◆ Construction activities (addressed by General Construction Storm Water Permit),
- ◆ Facilities which have other NPDES permits containing storm water provisions,
- ◆ Facilities determined ineligible by RWQCBs,
- ◆ Facilities which do not discharge storm water to waters of the U.S. (including facilities that discharge storm water to municipal sanitary sewers or combined sewer systems and facilities that do not discharge storm water to surface waters or MS4s,
- ◆ Most silvicultural activities,
- ◆ Mining and oil and gas facilities that have not released storm water resulting in a discharge of a reportable quantity (RQ), and
- ◆ Facilities on Indian Lands.

4.4 NO EXPOSURE CERTIFICATION (NEC)

The SWRCB may grant a No Exposure Certification (NEC) to those facilities where all industrial activities are conducted inside buildings and where all materials stored and handled are not exposed to storm water. The NEC provides an exemption to requirements to obtain coverage under the General Industrial Permit. To qualify for a NEC, facility operators must certify that their facilities meet the conditions specified in Section 12, paragraph I of the General Industrial Permit.

A condition of no exposure exists when exposure of all industrial materials and activities to rain, snow, snowmelt, and/or runoff is prevented by a storm resistant shelter to. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Another condition of NEC indicates that there is no exposure of storm water to significant materials associated with industrial activity through other direct or indirect pathways such as from industrial activities that generate dust and particulates. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product.

A lessee must maintain a condition of no exposure at its facility or site in order for the NEC to remain applicable. If conditions change resulting in the exposure of materials and activities to storm water, the facility operator must immediately obtain coverage under the General Industrial Permit. Facilities must be re-evaluated at least annually to assure that the NEC conditions are continuously met.

4.5 STANDARD INDUSTRIAL CLASSIFICATION CODE

The SIC system has been used throughout the Federal government to group establishments into industries. The SIC system developed a series of 2, 3, and 4 digit numeric codes for establishments that produce similar products or provide similar services. For example, all establishments that manufacture automobiles are in the same industry and are classified under numeric code 37. The SIC codes associated with each of the ten categories listed in Attachment 1 of the General Industrial Permit are presented in Table 1 (alphabetically) and Table 2 (numerically) within Appendix F.

An evaluation of non-residential facilities/parcels associated with RW Airspace and Property Management was conducted in March 2005.² The results of this evaluation are summarized as Exhibits 1 and 2. Exhibit 1 presents facilities/activities that will require coverage under the General Industrial Permit based on their associated SIC code, unless more detailed investigation by District RW determines they are not. Exhibit 2 displays facilities/parcels that were identified as not requiring coverage at the time of the evaluation. Although the facilities included under these SIC codes are generally not required to obtain coverage under the General Industrial Permit, they are required to obtain coverage if “industrial” materials (including wastes), equipment (e.g., forklifts) or activities (loading/unloading) are exposed to storm water. The SIC code associated with the lessee’s activity is reviewed during facility inspections.

4.6 STORM WATER INSPECTION PROCEDURES

4.6.1 Pre-Inspection Preparation

Establish Purpose

Prior to the storm water inspection, the purpose and the scope of inspection are to be identified and available pertinent background information (e.g. Exhibits 1 and 2) reviewed. Overall, inspections are necessary to identify potential sources of storm water pollutants and to ensure that BMPs are adequate and effectively implemented to control these sources. Site officers and managers should be contacted to schedule the inspection and to request that relevant documents (e.g., SWPPP, site plans, chemical inventory logs, spill response plan, etc) are available on site for review. The RW agent should prepare for the inspection by obtaining the appropriate inspection form for the property type. Forms for residential, non-residential and airspace storm water inspections are included as Appendices H, I and J respectively.

File review

The RW agent should review available lessee files or information for the facility, including any past complaints, permits, or monitoring data. Lessees whose activities are subject to the General Industrial Permit are required to provide copies of the NOI (or NEC) filed with the SWRCB, the receipt letter (with the WDID number), and the SWPPP prepared in compliance with the General Industrial Permit. These documents should be found in the lessee file or requested during the storm water inspection.

² Letter Report to RW Headquarters, April 18, 2005.

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Airspace and Property Management Leases

The RW agent should review the current identified industrial activities and potential pollutants of concern within Exhibits 1 and 2 (Appendix G). The exhibits provide additional information indicating types of materials used, activities conducted, and the facility's Waste Discharge Identification (WDID) number. This information should be compared against the information that is obtained during the inspection to verify its accuracy.

4.6.2 Approaching the Site

Observations

Before entering the facility grounds, the following conditions should be noted by the RW agent:

- ◆ Nearby conveyances or water bodies;
- ◆ Visible discharge points along the perimeter of the site;
- ◆ Outdoor areas of intensive industrial activity; and
- ◆ Signs of recent additions or remodeling.

4.6.3 Facility Inspection

Entry

The RW agent should arrange to meet with the appropriate facility officials to discuss the inspection scope and objectives of the inspection. RW Agents should refer to existing RW procedures before entering a property for inspections. All RW leases have a Right of Entry clause that specify when and how RW Agents can inspect the lease premises. RW agents should refer to the specific property agreement to confirm specific procedures.

Opening Conference

After authorized entry, the RW agent should discuss the inspection scope and objectives of the inspection with the facility officials. Attempt to verify and update the lessee's information, such as:

- ◆ Changes in ownership or operations
- ◆ Clarification of observations noted by the RW agent before entering the facility, (any changes in activities, materials, or physical structures should be reflected in the SWPPP)
- ◆ If applicable, review of the SWPPP, which should include these elements:
 - Site map;
 - List of industrial activities, types of pollutants, and existing non-structural and structural BMPs to reduce these pollutants in storm water discharge;
 - Pollution prevention methods;
 - Description of type and location of non-storm water discharges, both authorized and unauthorized; and
 - Inventory of materials, including storage and loading/unloading areas.

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- ◆ Review of any existing storm water monitoring data.

Outdoor walk-through

The RW agent and responsible facility personnel should walk through all outdoor areas and observe activities, wherever it is safe to do so. Typical areas of activity that might impact storm water quality from Industrial Activities are listed in Table 5-1.

The RW agent should attempt to gain a clear understanding of how runoff leaves the facility site by observing all portions of the storm water conveyance system and site grading, where possible and safe. This includes storm drain inlets and outlets and open channel conveyances such as ditches, etc.

The RW agent must document the observed conditions, including BMPs being implemented, and assess the facility's impact on storm water quality from the outdoor activities. The impact assessment should include the facility's *potential* to discharge to the MS4 or surface waters and the facility's *actual* discharge, which are further described in Section 4.0. Illicit Connection/Illegal Discharge.

Illicit connections and illegal discharges refer to discharges and dumping into the Department's MS4 that have not been approved by The Department.³ The State of California identifies illegal discharges as any discharge to a MS4 that is not composed entirely of storm water, except discharges pursuant to an NPDES Permit and discharges resulting from certain exempt and conditionally exempt activities.

During the storm water inspection, observations indicating an illegal discharge may include:

- Visible signs of staining or unusual colors to the pavement or surrounding adjacent soils;
- Pungent odors coming from the drainage systems;
- Discoloration or oily substances in the water or stains and residues detained within ditches, channels or drain boxes; and
- Abnormal water flow during the dry weather season.

Identification of illicit connections will require an evaluation of all drains (inlets and outlets) in order to identify whether they connect to the MS4. Illicit connections may carry unauthorized drainage, wastewater, other illicit discharges, and pollutants to the MS4. Illicit connections may be intentional or may be unknown to the property owner. The Department has authority over its property to investigate and resolve illicit connections discovered within the right-of-way. Recognition of illicit connections requires the evaluation of all drain inlets and outlets in order to determine if they connect to the MS4. At times, observations indicating an illicit connection can be straightforward, and may include:

- Water conveyance systems (hoses or pipes) from a drain outlet to the MS4

³ Caltrans Storm Water Quality Handbook, Maintenance Staff Guide, May 2003.

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- Pungent odors coming from the drainage systems

RW should report all suspect illicit connections to the District NPDES Coordinator. Resolution may include elimination of the connection, proper permitting, or other appropriate actions. Moreover, during the storm water inspection, the RW agent should inventory and inspect each discharge point during dry weather. It is important to note that drainage from a storm event can continue for a day or two following the end of a storm event and ground water may infiltrate into underground storm drains.

Indoor Walk-Through

The RW agent should review indoor activities and areas to ensure that pollutants are not spilled, dumped, or allowed to flow outdoors. The RW agent should document the observed conditions, including any BMPs being implemented, and assess the facility's impact on storm water quality from the indoor activities.

Assess Impact on Storm Water Quality

The RW agent should attempt to determine the facility's impact on storm water quality at two levels: the facility's potential for discharge and the facility's actual discharge. The difference between potential and actual is determined by whether BMPs are effectively applied. For example, a facility that stores all machinery and heavy equipment outdoors or performs certain activities outdoors has a higher potential to impact storm water runoff quality. However, if equipment is well maintained and covered when not in use, the level of pollutant exposure and the facility's actual impact on storm water runoff quality is greatly reduced. The RW agent should note three things on the inspection report:

- 1) What is the facility's potential to impact storm water quality and non-storm water discharges from exposure to on-site pollutants? Identify areas or activities that require BMPs to be applied to reduce or eliminate potential pollutant discharges to the MS4. If BMPs are in place, determine what the impact would be if BMPs failed or were no longer applied.
- 2) Are BMPs effectively applied so that exposure to pollutants is minimized and non-storm water discharges are eliminated? For each of the facility's areas of activity, observe whether BMPs are in place and effective. The RW agent may encounter situations where BMPs are in place but are not effectively applied. The RW agent will use their best professional judgment on the imminent impact of the facility and decide how much time to allow the owner/operator to correct the problem.
- 3) What types of impact does the facility have on storm water quality? Clearly describe on the inspection report whether the impact is from: 1) pollutant exposure to runoff; and/or 2) non-storm water intentionally or accidentally discharged to storm drains.

Document Inspection Activities

As appropriate, the RW agent should document outdoor and indoor activities observed at the facility with notes and photos. This documentation should include the locations and types of BMPs that are currently being implemented and assessments of areas where BMPs should be implemented in the future. These facilities are required to control the discharge of pollutants through implementation of source control

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BMPs. Although monitoring is not required, the RW agent may also arrange for collection of samples when illicit discharges or unauthorized non-storm water discharges from the facility are suspected.

An inspection form has been provided for use by RW agents in documenting the above information during a site inspection. Use of this form is suggested to maintain consistency in RW inspection efforts.

Closing Conference

After the walk-through of the facility, the RW agent should collect any missing or additional information, including verifying the SIC codes. If necessary, the RW agent should review other documentation to look for indications of discharge problems such as permits, manifests, logs and other records required of the facility by local, state or federal laws in order to conduct operations or business on the premises. The inspection findings should be reviewed with the facility officials and they should be informed of follow-up procedures.

Finally, the RW agent should provide educational materials, applicable BMP fact sheets, and other regulatory guidance (i.e. information on the General Industrial Permit) to assist lessees in maintaining or attaining compliance.

4.6.4 Record Keeping

The RW agent must update Exhibits 1 and 2 (Appendix G) and review the completed inspection report upon return to the office. The inspection report should contain at least the following sections:

- ◆ General information to update Exhibits 1 and 2;
- ◆ Assessment of BMP implementation;
- ◆ Documentation of violations and time frame for correction; and
- ◆ Signature and confirmation.

Follow-up inspections will be done as needed to confirm BMP implementation and compliance.

Based on the results of the inspection, a standardized letter is provided in Appendix K, which should be sent to each of the lessees whose facilities appear to require coverage under the General Industrial Permit. This standardized letter requests that the facilities verify the SIC code that has been assigned to their facility, include an attachment providing basic information about the General Industrial Permit, and request that the facility provide their WDID number if the facility already has coverage under the General Permit or an individual NPDES permit that includes storm water.

A second standardized letter is also provided in Appendix K which should be sent to each of the lessees whose facilities have an SIC code that would require coverage under the General Industrial Permit if materials, equipment, or activities were exposed to storm water. This standardized letter requests that the facilities verify the SIC code that has been assigned to their operation and includes an attachment that provides basic information about the General Industrial Permit.

5.0 STORM WATER DISCHARGE ASSESSMENT

Most non-residential facilities are subject to coverage under the General Industrial Permit if 1) the facility's manufacturing or processing activities, raw materials storage areas, or intermediate products storage areas are exposed or come into contact with storm water runoff or snow melt runoff, or storm water surface runoff, and 2) that runoff leaves the facility from one, or several, point sources that discharge into a MS4 or directly into waters of the state. Information is presented in this section to assist RW agents in assessing potential storm water discharges associated with industrial activities.

5.1 FACILITY ACTIVITIES

The recommended approach in assessing potential storm water discharges is to identify key activities or activity areas that are likely sources of pollutants. During inspections by RW agents, a facility's industrial activities, associated pollutant sources, and potential pollutants that could be discharged in storm water discharges or authorized non-storm water discharges must be identified. Furthermore, during the inspection, the RW agent may observe "significant materials". The General Industrial Permit states that significant materials include:

raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under Section 101(14) of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); any chemicals the facility is required to report pursuant to Section 313 of Title III of Superfund Amendments and Reauthorization Act (SARA); fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with storm water discharges.

Facility areas and activities that are to be included in the RW agent's storm water inspection are listed below. The potential pollutants associated with these areas and activities are displayed in Table 5-1.

- ◆ Parking Lots
- ◆ Building and Grounds Maintenance
- ◆ Landscape Maintenance
- ◆ Outdoor Loading and Unloading of Materials
- ◆ Outdoor Storage of Materials/products/Equipment
- ◆ Waste Handling and Disposal
- ◆ Erodible Surface Areas

Table 5-1. Potential Pollutants from Industrial Activities

Activity or Facility Type	Potential Pollutants								
	Sediments	Nutrients	Metals	Organics and Toxicants ¹	Floatable Materials	Oxygen-Demanding Substances	Oil and Grease	Bacteria	Pesticides
Vehicle and Equipment Fueling			X	X			X		
Vehicle and Equipment Washing and Steam Cleaning	X	X	X	X		X	X		
Vehicle and Equipment Maintenance and Repair			X	X	X		X		
Outdoor Loading & Unloading of Materials	X	X	X	X	X	X	X		
Outdoor Container Storage of Liquids		X	X	X		X	X		X
Outdoor Process Equipment Operations and Maintenance'	X		X	X			X		
Outdoor Storage of Raw materials, Products, and By-Products	X	X	X	X	X	X	X		
Waste Handling & Disposal			X	X	X	X	X	X	
Contaminated or Erodible Surface Areas	X	X	X	X	X	X	X	X	
Building and Grounds Maintenance	X	X	X		X	X		X	X
Building Repair, Remodeling and Construction	X		X		X	X			
Parking/Storage Area Maintenance			X	X	X		X		

¹ This includes all toxic pollutants other than pesticides

5.2 NON-STORM WATER DISCHARGE ASSESSMENT

RW agents must also be aware of the facility's non-storm water discharges and their sources. The General Industrial Permit defines a non-storm water discharge as *any discharge to storm sewer systems* (the Department's or other MS4s) *that is not composed entirely of storm water*. Exempt non-storm water discharges that do not include pollutants and can be discharged directly to the MS4 include flows from riparian habitats or wetlands, diverted stream flows, springs, rising ground waters, and uncontaminated ground water infiltration. Conditionally exempt non-storm water discharges typically do not contain pollutants and may be discharged to the MS4 with conditions. Conditionally exempt non-storm water discharges include the following:

- ◆ Fire hydrant flushing
- ◆ Potable water sources, including potable water related to the operation, maintenance, or testing of potable water systems
- ◆ Drinking fountain water
- ◆ Atmospheric condensate including refrigeration, air conditioning and compressor condensate
- ◆ Irrigation drainage

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- ◆ Landscape watering
- ◆ Springs
- ◆ Ground water
- ◆ Foundation or footing drainage
- ◆ Sea water infiltration where the sea waters are discharged back into the sea water source

Unauthorized non-storm water discharges that pose environmental concern may originate from illegal dumping or from internal floor drains, appliances, industrial processes, sinks, and toilets that are connected to the nearby MS4. These non-storm water discharges may include, but are not limited to:

- ◆ Process waste waters
- ◆ Cooling waters
- ◆ Wash waters
- ◆ Sanitary wastewater

Unauthorized non-storm water discharges can carry substances such as paint, oil, fuel and other automotive fluids, chemicals and other pollutants into the MS4. Unauthorized non-storm water discharges are prohibited by state and local MS4 requirements. During the storm water inspection, observations indicating an unauthorized non-storm water discharge may include:

- Visible signs of staining or unusual colors to the pavement or surrounding adjacent soils;
- Pungent odors coming from the drainage systems;
- Discoloration or oily substances in the water or stains and residues detained within ditches, channels or drain boxes; and
- Abnormal water flow during the dry weather season.

For identification of unauthorized non-storm water discharges, all drains (inlets and outlets) must be evaluated to identify whether they connect to the MS4. This may require a review of “as-built” drainage schematics, if available, as well as locating and evaluating all discharges to the MS4. At times, verification of an unauthorized non-storm water discharge may require a more rigorous application of detection methods such as smoke testing, dye testing, and video monitoring. Such testing methods are beyond the scope of RW and therefore all suspect non-storm water discharges should be reported to the District NPDES Coordinator. The ultimate goal of the Department’s IC/ID program is to effectively eliminate non-storm water discharges to the MS4 by implementing measures to detect, correct and enforce against illicit connections and illegal discharges of pollutants.

BMPs should be utilized to minimize the potential pollutants from non-storm water discharges. Moreover, the list of exempt non-storm water discharges may differ between individual Regional Boards;

therefore, the list of exempt non-storm water discharges may vary for similar business types operating within different Regional Board jurisdictions.

5.3 BMP IMPLEMENTATION EFFECTIVENESS

As part of the facility inspection, the RW agent must determine BMP implementation effectiveness. The non-residential facilities will most likely have already implemented BMPs. These BMPs may include pavement sweeping; proper disposal of wash water, sweepings and sediments; covered waste storage bins; and spill prevention and cleanup procedures. It is the responsibility of the RW agent to determine what BMPs are present and if their implementation is either satisfactory or needs improvement.

6.0 LESSEE COMPLIANCE

It is always the facility operator, rather than the property owner, that is the legal entity responsible for all General Industrial Permit related compliance activities at the facility. Lessees that require coverage under the General Industrial Permit will need to submit a Notice of Intent (NOI), a site map, and an application fee to the SWRCB. Additionally, they will be required to prepare and maintain onsite a SWPPP and implement a monitoring and reporting program. The following guidance will assist lessees that are required to obtain coverage under the General Industrial Permit.

6.1 NOTICE OF INTENT

The application to obtain coverage under the General Industrial Permit to discharge storm water associated with an industrial activity is called a NOI (Appendix L). The operator submits this document to notify the SWRCB of their intent to operate their facility in a manner consistent with the requirements of the General Industrial Permit. Facility operators must file their NOI at least 14 days prior to the beginning of operations.

6.2 SITE MAP

The facility operator must submit a site map along with the NOI. The site map must consist of a “to scale” drawing of the facility and its immediate surroundings. At a minimum, the site map must include the following detail: buildings; material handling and storage areas; roads; names of adjacent streets; storm water discharge point(s); sample collection point(s); and a north arrow. The map size should be limited to a standard size sheet of paper (e.g., 8.5” X 11” or 11” X 17”).

6.3 FEES

The current annual application fee for coverage under the General Industrial Permit can be found at <http://www.waterboards.ca.gov/stormwtr/docs/induspmt.pdf>. The check is made payable to the SWRCB. Once the completed NOI, site map and appropriate fee have been submitted to the SWRCB, the NOI will be processed and the facility operator will be issued a WDID.

6.4 STORM WATER POLLUTION PREVENTION PLAN

The General Industrial Permit requires the facility operator to prepare, retain on site, and implement a SWPPP prior to initiation of facility operations. Failure to do so is a direct violation of the General Industrial Permit. The two major objectives of the SWPPP are: (1) to help identify the sources of pollution that affect the quality of industrial storm water discharges and authorized non-storm water discharges, and (2) to describe and ensure the implementation of BMPs to reduce or prevent pollutants in industrial storm water discharges and authorized non-storm water discharges. The RW agent may refer the facility operator to Sections A and B of the General Industrial Permit for additional information regarding the SWPPP and Monitoring and Reporting Program or the facility operator may request information from the SWRCB or the RWQCBs.

6.5 PROGRESSIVE ENFORCEMENT

The facility operator is responsible for compliance with the requirements of the General Industrial Permit and it is the responsibility of the RWQCB to enforce these requirements. The RWQCB enforces the provisions of the Permit by reviewing SWPPPs and annual reports, conducting compliance inspections, and taking enforcement actions. The SWRCB recognizes that industrial activities and operating conditions at a facility may change over time. In addition, more effective BMPs are being developed by facility operators and by industrial groups. Facility operators that develop and implement SWPPPs that comply with the General Industrial Permit are not penalized when discovering minor violations through the SWPPP's self-evaluation process. Moreover, the General Industrial Permit provides facility operators up to 90 days to implement revisions to their SWPPPs to correct such violations.

The RW agent is responsible for inspecting the non-residential facilities and assessing compliance with the SWMP and lease requirements, including the facility's coverage under the General Industrial Permit, if applicable. As such, if a RW agent determines that a corrective action is necessary during a storm water inspection, a follow up inspection will be scheduled based on the degree of deficiency after the initial inspection. If during the follow-up inspection it is determined that corrective actions were not implemented, the RW agent shall submit a Corrective Action Notification letter to the facility operator and notify the District NPDES coordinator for assistance and possible follow up notification to the appropriate RWQCB (Appendix M). Depending on the severity of the violation, enforcement could range from documentation of a deficiency on the storm water inspection report to lease cancellation. If the Department is cited and fined by the RWQCB for a lessee's discharge, said fines will be passed through to the lessee.

7.0 BUSINESS CATEGORY GUIDANCE

Exhibit 2 presented in Appendix G displays property management and airspace lessees (active leases as of January 2005) that do not require coverage under the General Industrial Permit. Although these business categories do not require coverage, they may tend to have a potential to pollute storm water based on the products they use and their activities. Therefore, it is the responsibility of the Department RW to determine type of facility, assess potential pollution source(s) and provide guidance to assist the lessee in identifying appropriate Source Control BMPs. For the facility assessment, the RW agent can follow the same step-wise procedures that were provided for the storm water inspections in Section 4.6. Table 7-1 lists typical business categories, based on land use, for property management and airspace lessees, potential pollution sources associated with each of these business categories and potentially applicable Source Control BMP fact sheet(s).

The Source Control BMP fact sheets that are referenced in Table 7-1 are also available in Appendices D and E of this Manual. These fact sheets address a collection of activities typically associated with a certain type of business. The BMP fact sheets are individually page numbered and are suitable for photocopying. The RW agent may wish to provide these fact sheets to the facility operator in an effort to provide a single source of information regarding storm water pollution prevention.

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Table 7-1 Potential Sources of Storm Water Pollution Sorted by Land Use and Recommended BMPs

LAND USE	POTENTIAL SOURCES OF POLLUTION	RECOMMENDED BMP FACT SHEET(S)
Residential	<div>Trash/Debris</div> <div>Pet Waste</div> <div>Sewer Stoppage/Overflow</div> <div>Pet Washing</div> <div>Broken Water Pipes</div> <div>Automotive Maintenance</div> <div>Landscape Maintenance</div> <div>Swimming Pool Maintenance</div> <div>Hazardous Household Waste/Disposal</div>	<div>Residential</div> <div>General Land Use</div> <div>General Maintenance</div> <div>Swimming Pool Maintenance</div>
Parking Lots	<div>Leaking Vehicles</div> <div>Spills</div> <div>Trash/Debris</div> <div>Runoff</div>	Parking Lots
Storage	<div>Trash/Debris</div> <div>Illegal Discharges</div> <div>Leaking Vehicles</div> <div>Storage of Loose Materials</div> <div>Sediment on Construction Equipment</div>	Storage
Animal Handling Areas	<div>Animal Washing</div> <div>Animal Wastes</div> <div>Feed Storage</div>	Animal Handling Areas
Office	<div>Trash/Debris</div> <div>Building Maintenance</div> <div>Leaking Vehicles</div> <div>Landscape Maintenance</div> <div>Window Washing</div>	Office/Retail
Sign Boards/Billboards	<div>Trash/Debris</div> <div>Solid Waste</div> <div>Poor Housekeeping Conditions</div>	Sign Boards/Billboards
Outdoor Loading / Unloading of Materials	<div>Spills/Leaks</div> <div>Runoff</div> <div>Liquid Waste</div> <div>Faulty Equipment</div> <div>Debris</div>	Outdoor Loading/ Unloading
Retail	<div>Trash/Debris</div> <div>Building Maintenance</div> <div>Leaking Vehicles</div> <div>Landscape Maintenance</div> <div>Window Washing</div>	Office/Retail

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Table 7-1 Potential Sources of Storm Water Pollution Sorted by Land Use and Recommended BMPs

LAND USE	POTENTIAL SOURCES OF POLLUTION		RECOMMENDED BMP FACT SHEET(S)
Food Service Facilities	Trash/Debris Solid Waste Equipment Wash down	Spills/Leaks Grease Handling/Disposal Landscape Maintenance	Food Service Facilities
Light Manufacturing	Trash/Debris Poor Housekeeping Conditions Painting Landscape Maintenance	Solid Waste Chemical Storage Outdoor Storage Leaking Vehicles	Light Manufacturing
Light Industrial	Trash/Debris Tracking Sediment Solid Waste Outdoor Storage	Poor Housekeeping Conditions Landscape Maintenance Chemical Storage Leaking Vehicles	Light Industrial
Commercial / Light Industrial	Trash/Debris Leaking Vehicles Window Washing Poor Housekeeping Conditions Solid Waste	Building Maintenance Landscape Maintenance Outdoor Storage Chemical Storage	Light Industrial Office/Retail
Auto Body Shop	Vehicle Washing Detailing Spray Painting Outdoor Storage of Chemicals, Solvents, Batteries	Spills/Leaks Poor Housekeeping Conditions Trash/Debris	Auto Body Shop
Auto Sales & Rentals/Tractor Sales	Vehicle Washing Vehicle Fueling Trash/Debris	Spills/Leaks Poor Housekeeping Conditions	Auto Sales & Rentals/Tractor Sales
Vehicle Repair and Storage	Leaking Vehicles Spills/Leaks Storage of Chemicals, Solvents, Batteries	Poor Housekeeping Conditions Chemical Storage	Truck or Vehicle Repair and Storage
Vehicle or Equipment Storage	Leaking Vehicles Sediment on Construction Equipment	Trash/Debris Spills/Leaks	Vehicle or Equipment Storage

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Table 7-1 Potential Sources of Storm Water Pollution Sorted by Land Use and Recommended BMPs

LAND USE	POTENTIAL SOURCES OF POLLUTION	RECOMMENDED BMP FACT SHEET(S)
Auto Recycling	Trash/Debris Leaking Vehicles Chemical Storage Outdoor Storage of Chemicals, Solvents, Batteries	Auto Recycling
General Recycling	Trash Uncovered Materials	General Recycling
Xmas Tree/Pumpkin Lots/Flower Stand/Plant Nurseries	Trash/Debris Sediment Tracking Burning Excess Plant Material	Xmas Tree/Pumpkin Lots/Flower Stand/Plant Nurseries
Parks & Recreation / Tennis Court	Landscape Maintenance Trash/Debris Restroom Service	Parks & Recreation
Agricultural	Irrigation Runoff Fertilizer Use Herbicide/Pesticide Use Farm Equipment Maintenance	Agricultural Animal Handling Areas
Marinas, Boat Yards and Ports	Sand Blasting Painting Boat Washing Spills/Leaks Storage of Chemicals, Solvents, Batteries	Marinas, Boat Yards and Ports
General	Illicit Connections/Illegal Discharge General Maintenance and Repair General Housekeeping	General

8.0 RESIDENTIAL FACILITY GUIDANCE

Runoff generated from RW residential properties includes all flows discharged into MS4s and receiving waters and includes both dry weather non-storm water sources (e.g., runoff from landscape irrigation, etc.) and wet weather storm water runoff. This section presents a discussion of potential pollutants associated with residential activities and provides general guidance for identifying and implementing BMPs to reduce pollutants in runoff at residential facilities

8.1 POLLUTANTS AND IMPACTS ON WATER QUALITY

Water runoff contains numerous constituents, and residential activities typically increase constituent concentrations in runoff to levels that impact water quality. Anticipated and potential pollutants generated by residential development are presented in Table 8-1.

Table 8-1. Anticipated and Potential Pollutants Generated by Residential Type

GENERAL POLLUTANT CATEGORY	RESIDENTIAL DEVELOPMENT
Pathogens	X
Heavy Metals	
Nutrients	X
Pesticides	X
Organic Compounds	
Sediments	X
Trash & Debris	X
Oxygen Demanding Substances	X
Oil & Grease	X

X = anticipated, P = Potential, (1) A potential pollutant if landscaping exists on-site; (2) A potential pollutant if the project includes uncovered parking areas.

Residential activities have the potential to result in long-term water quality impacts. For example, residential activities can result in the generation of dry-weather runoff that may contain many of the pollutants listed above. Impervious surfaces such as streets, rooftops and parking lots, prevent runoff infiltration and may increase the rate and volume of storm water runoff that may increase downstream erosion potential and associated potential water quality impairment. Furthermore, residential activities and increased impervious surfaces can increase the concentration and/or total load of many of the pollutants listed above in wet weather storm water runoff. Therefore, it is the responsibility of RW to assess residential activities and identify potential pollutant sources and ensure that appropriate BMPs are implemented.

8.2 BEST MANAGEMENT PRACTICES FOR RESIDENTIAL FACILITIES

The Caltrans Statewide Permit requires implementation of the SWMP and assessment of the effectiveness of the program. Overall, the program prohibits non-exempt non-storm water discharges into MS4s, and requires controls to reduce the discharge of pollutants to the maximum extent practicable (MEP). This section provides information on the necessary elements and steps involved in identifying BMPs for residential activities occurring on the Department right-of-way.

8.2.1 BMP Identification and Implementation

The Department rents residential properties to tenants, and uses maintenance contractors to perform maintenance of those properties. Maintenance contractors may do work such as interior and exterior painting, landscaping, pool and other maintenance and repair. The Department contractors also implement appropriate BMPs to reduce the discharge of pollutants associated with these activities. Tenants of single-family residences may also be responsible for yard or pool maintenance on the property they are renting. Potential sources of pollutants associated with tenant activities at residential facilities include:

- Gardening;
- On-site sewer system breaks and overflows;
- Garbage Disposal;
- Storage and Disposal of Household Hazardous Waste;
- Domestic Pets; and
- Vehicles.

The residential storm water pollution fact sheet has been developed which identifies BMPs associated with the sources and activities listed above. Moreover, lease language explicitly specifies requirements to ensure measures are taken to reduce pollutants while lessees perform such activities. In particular, the lease language specifies the requirements to comply with all BMP specifications.

Successful implementation of a BMP is dependent on regular storm water inspections, periodic evaluation of BMP performance, and follow-up action to correct deficiencies in BMP implementation noted during storm water inspections.

8.3 RESIDENTIAL STORM WATER INSPECTIONS

Storm water inspections of residential facilities are typically performed annually to verify that BMPs are implemented, that they are appropriate for the sources and activities present on-site, and that they continue to reduce the discharge of pollutants (Section 3.6). In the event of an observed problem, such as detected non-storm water discharges, the inspection frequency should be increased as appropriate to facilitate correction of the problem (see Section 5.5 for discussion regarding progressive enforcement measures).

Residential storm water inspection reports are used to document inspection findings and compile information for record keeping and annual reporting (Appendix H). The inspection report provides for a general characterization of the facility being inspected, the reason for the inspection, activities that may take place, and BMPs applicable for the facility. The residential storm water inspection report also provides documentation of suggested corrective actions that can be implemented should a problem be found.

8.3.1 Enforcement

To ensure proper BMP implementation, enforcement procedures and mechanisms are established for residential facilities. Enforcement actions may occur as a result of a problem found during a storm water inspection or in response to a complaint that is received. Depending on the severity of the violation, RW enforcement could range from documentation of a deficiency on the storm water inspection report to termination of tenancy. If the Department is cited and fined by the RWQCB for a tenant's discharge, the fines will be passed through to the tenant.

8.3.2 Documentation

Storm water inspection reports should be retained and reviewed to track frequency and results of inspections, BMPs implemented, compliance deficiencies and follow-up actions taken. It is also important to keep a record of maintenance-type activities or any other BMPs that are of an "action" nature. For example, actions that related to good housekeeping can only be demonstrated by record keeping. A table that displays residential activities and their associated BMPs is provided in Appendix N of this Manual.

9.0 PROPERTY MAINTENANCE ACTIVITIES CATEGORY GUIDANCE

Non-residential lessees and RW maintenance contractors also perform maintenance on Caltrans property. Therefore, it is the responsibility of the RW agent to provide guidance to assist the Department's lessees and maintenance contractors in identifying appropriate source control BMPs. Table 9-1 displays typical property maintenance categories, for RW maintenance contractors, as well as property management and airspace lessees. Table 9-1 also identifies potential pollution sources associated with each of these maintenance categories and applicable Source Control BMP fact sheet. The objective of implementing source control BMPs is to ensure that property maintenance activities conducted by the State's lessees and maintenance contractors are implemented in a manner that reduces or eliminates the potential for pollutants to be discharged to surface waters via the MS4.

The Source Control BMP fact sheets for maintenance activities that are referenced in Table 9-1 are also available in Appendices D and E of this Manual. These fact sheets address a collection of activities typically associated with a certain type of maintenance. The BMP fact sheets are individually page numbered and are suitable for photocopying. The RW agent may wish to provide these fact sheets to lessees and maintenance contractors in an effort to provide a single source of information regarding storm water pollution prevention.

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Table 9-1 Potential Sources of Storm Water Pollution Sorted by Maintenance Activity and Recommended BMPs

PROPERTY MAINTENANCE ACTIVITIES	POTENTIAL SOURCES OF POLLUTION	RECOMMENDED BMP FACT SHEET(S)
Weed Abatement, Mowing, Discing	Pesticide Soil Erosion Vegetation Stockpile/Disposal	Yard Service
Tree Trimming	Vegetation Stockpile/Disposal	Yard Service
Fence Repair	Solid Waste/Debris Soil Erosion	General Maintenance
Graffiti Removal/Painting	Sand Blasting Paint Sand Blasting Waste Paint Waste Soil Erosion Spills/Leaks Equipment Cleaning	General Maintenance
Trash Removal	Solid Waste/Debris Improper Waste Storage Waste Mixing Poor Housekeeping Conditions	Trash Removal
Landscape/Yard Service	Irrigation Runoff Fertilizer Use Pesticide Soil Erosion Vegetation Stockpile/Disposal	Yard Service
Roof Repair or Replacement	Solid Waste/Debris Liquid Waste Improper Waste Storage Chemical Use Poor Housekeeping Conditions	General Maintenance

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Table 9-1 Potential Sources of Storm Water Pollution Sorted by Maintenance Activity and Recommended BMPs

PROPERTY MAINTENANCE ACTIVITIES	POTENTIAL SOURCES OF POLLUTION	RECOMMENDED BMP FACT SHEET(S)
Chimney Maintenance	Solid Waste/Debris Liquid Waste Improper Waste Storage Chemical Use Poor Housekeeping Conditions	General Maintenance
Plumbing	Solid Waste/Debris Liquid Waste Chemical Use Poor Housekeeping Conditions	General Maintenance
Carpenter	Solid Waste/Debris Chemical Use Poor Housekeeping Conditions	General Maintenance
Fumigation/Pest and Rodent Control	Pesticide Use Chemical Use Spills/Leaks Over spray/Excessive Application	Fumigation/Pest and Rodent Control
Sewer or Drain Cleaning/Septic Systems	Solid Waste/Debris Liquid Waste Soil Erosion Poor Housekeeping Conditions Illegal Discharges/Illicit Connections	Sewer or Drain Cleaning and Maintenance/Septic Systems
Board-ups	Solid Waste/Debris Liquid Waste Chemical Use Poor Housekeeping Conditions	Board-ups

Appendix A

Caltrans Statewide Storm Water Permit

Appendix B

Industrial Activities Storm Water General Permit

Appendix C
State and Regional Water Boards

Appendix D
Residential BMP Fact Sheets

Appendix E
Non-Residential BMP Fact Sheets

Appendix F

Standard Industrial Classification Code

Table 1. SIC Code (Alphabetical Listing)

Table 2. SIC Code (Numerical Listing)

Appendix G

**Exhibit 1: Facilities/Activities Requiring Coverage Under the General
Industrial Permit**

**Exhibit 2: Facilities/Activities Not Requiring Coverage Under the General
Industrial Permit**

Appendix H
Residential Storm Water Inspection Report

Appendix I

Non-Residential Storm Water Inspection Report

Appendix J
Airspace Storm Water Inspection Report

Appendix K

Standardized Letters to Facility Operator: Possible Need for Coverage

Appendix L
Notice of Intent

Appendix M
Corrective Action Notification Letter

Appendix N
Residential Activity BMPs

Group A: BMPs sorted by Land Use

Group B: BMPs Sorted by Maintenance Activity